

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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Application of Pacific Gas and Electric  
Company To Revise Its Electric Marginal  
Costs, Revenue Allocation, And Rate  
Design.

Application No. 06-03-005

**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON THE  
SUPPLEMENTAL SCOPING MEMO AND ASSIGNED COMMISSIONER RULING  
UPDATING ISSUES LIST, SCHEDULE, AND CATEGORIZATION**

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Dated: October 19, 2007

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Pursuant to the schedule established in the August 22, 2007 Supplemental Scoping Memo and Assigned Commissioner's Ruling, PG&E hereby responds to the opening comments submitted by Southern California Edison (SCE), San Diego Gas and Electric (SDG&E), the Division of Ratepayer Advocates (DRA), the Building Owners and Managers Association (BOMA), the California Rice Millers (CRM), the California Large Energy Consumers Association (CLECA), the California Manufacturers and Technology Association (CMTA), Ice Energy, The Utility Reform Network (TURN), and the Western Power Traders Forum (WPTF).

Various parties have observed that many developments in the procurement market and the state's evolving electricity plans (*e.g.*, new resource adequacy standards and planning reserve margin requirements; resource portfolio standards; and capacity market developments) make it increasingly likely that future real-time prices are likely to remain relatively low for all but a small number of hours each year. While this outlook should bode well for the stability of future California electricity prices for all customers, it also has policy implications in evaluating the market potential for dynamic pricing. Simply put, expectations should be modest for customer response to dynamic prices that are likely to remain relatively low for all but a small number of hours each year, lower than would be expected to elicit significant demand response. It also

means that the primary source of time variation for dynamic prices at levels sufficient to elicit significant demand response will likely come from the assignment of administratively-determined generation capacity cost adders to specific hours or groups of hours – either in a way such as is already used to set Critical Peak Pricing (CPP) price signals, or through generation capacity cost allocation methods that might be established in the currently pending Demand Response OIR (R.07-01-041).

**I. Objectives of dynamic pricing and time-differentiated rates.**

*PG&E urges the Commission to adopt clearly defined and narrowly stated policy goals for this dynamic pricing investigation.*

Nearly all parties join PG&E in urging that the development of improved cost-based price signals should be the primary objective of this proceeding. To the extent that improved cost-based price signals afford new opportunities for peak-period demand reductions, this will improve system reliability and should generally flatten the load curve over the long run. However, these developments should be recognized as the results of customer response to improved price signals rather than as goals to be achieved through specific pricing mechanisms that might go above or beyond cost-based pricing.

**II. Rate options.**

*PG&E urges the Commission to develop new dynamic pricing options and demand response programs while preserving customer choice, and to focus attention on those rate classes, customer groups and end uses with the greatest potential for producing significant new sources of demand reductions.*

PG&E is encouraged that nearly all parties who have offered comments agree that the Commission should preserve customer choice as it develops new dynamic pricing tariff options.

PG&E disagrees with the following comment by TURN: “An optional CPP rate structure could also be developed for the residential class ... via a linkage with Resource Adequacy policy ... LSEs could procure to a lower PRM for those customers who opt for a CPP tariff – perhaps

10% but in any event no lower than the 7% required to maintain system operating reserves.” (TURN at pp. 8-9.) In fact, there is no practical means by which a utility might procure different levels of planning reserves for different customers. When supplies are short, supplies are short for *all* customers. Aside from those served under interruptible or curtailable tariffs, there is no means of providing different customers with differing levels of service reliability.

PG&E also disagrees with the following observation by DRA: “It is well known that coastal customers currently subsidize inland customers with large air conditioning loads.” (DRA at p. 9.) While a case might have been made for this conclusion when most of the state’s residential electric tariffs had just two tiers (and when there were relatively modest price differences between those two tiers), it cannot be assumed true today. Given the steeply inverted five-tier rates that are now in effect and the likelihood that “inland customers with large air conditioning loads” are paying high upper-tier prices for significant fractions of their air conditioning usage, it would be difficult to draw the same cross-subsidy conclusion now.

### **III. Components of dynamic pricing tariffs.**

*PG&E argues that the scope of the pricing investigation undertaken here should be limited to the generation component of rates, and to rates for bundled service customers only. PG&E has also cautioned that visible forward market prices from the MRTU are not yet available, and that it may take some time after MRTU implementation begins to determine the suitability of MRTU prices for ratemaking purposes.*

Most parties offering comments have agreed – either explicitly or implicitly – that the scope of this proceeding can reasonably be limited to the generation component of rates, as paid by bundled service customers only. To the extent certain parties have differed on this point, PG&E does not believe they have offered persuasive grounds for expanding the scope of the investigation. For example, BOMA conflates future *transmission congestion* prices that might be published by the CAISO with recovery of *transmission access* and *reliability services* costs, which are recovered through FERC-jurisdictional rate components. (BOMA at pp. 10-11.)

PG&E does not believe the CAISO plans to develop “hourly marginal cost estimates” appropriate for setting the transmission component of rates, and notes that such rates are FERC-jurisdictional rather than subject to CPUC ratemaking. Similarly, DRA recommends expanding the scope of this investigation to include further consideration of the *distribution* component of rates. (DRA at pp. 9-11.) PG&E believes such an expansion would add unnecessary complication to the current investigation. The “distribution” component of rates is a shorthand for the portion of rates that includes all distribution, customer service, and metering and billing costs. The share of these costs that can reasonably be treated as time-varying is small in comparison to the share of generation costs that can be so treated. Thus, it is reasonable to focus most attention on generation rates in this dynamic pricing investigation.

#### **IV. Recovering the revenue requirement.**

*PG&E observes that costs and revenues should be reasonably well correlated if well-designed and cost-based dynamic tariffs are adopted. This means that the revenue under-collections that might result from lower than expected sales should be partially offset by lower procurement costs relative to the original forecast used to set rates (and conversely, if electricity usage is higher than expected).*

As PG&E observed in its initial comments, customer response to dynamic tariffs should reduce both revenues and procurement costs, which would complicate any effort to establish class-specific balancing accounts. Nonetheless, several parties have offered comments that might be interpreted as requiring class-specific or even schedule-specific revenue reconciliation (e.g., CLECA at p. 19 and CMTA at pp. 10-11). Such an approach would require developing new methods for tracking and attributing both reduced revenues and reduced procurement costs by rate class, and PG&E believes such an approach to be unnecessary as long as the underlying tariffs reasonably accord with costs. However, where specific and explicit incentives (such as participation credits) are offered to encourage additional program enrollment, PG&E agrees that it is reasonable approximately to maintain recovery of the costs of such incentives within each

class. Aside from this limited exception, PG&E believes it most reasonable to establish cost-based dynamic tariffs in such a way that balancing account reconciliation can continue to be accomplished at the system level rather than by rate class or rate schedule.

**V. Hedging.**

*PG&E notes that a system of voluntary participation credits (paid for by small premiums in the rates paid by non-participants) can serve the same practical purpose as explicit hedge premiums applied to non-participants' rates. PG&E cautions that the concept of hedge premiums may be used differently in different contexts, and PG&E is not convinced that a solid foundation has yet been established for applying this concept to develop dynamic pricing options.*

PG&E will look to the work of the Demand Response Research Center (DRRC) and further discussion at the November workshops for additional information on this subject.

**VI. Sources of triggers and prices for dynamic prices.**

*PG&E recommends that most dynamic price triggers and demand response program operations should be activated and communicated to customers by the utility, acting in close consultation with the CAISO. Development of new RTP tariffs should be deferred until MRTU implementation is completed and at least 12 - 18 months of MRTU data is available.*

There appears to be a broad consensus that the utilities should continue to manage demand response program operations and customer communications, subject to operating guidelines developed in consultation with the CAISO. Similarly, nearly all parties are looking to the MRTU process as a future source for RTP market price information. As PG&E previously cautioned, RTP tariffs will need to be designed to collect the same generation revenue requirement as do the less time-differentiated tariffs. Thus, new methods will need to be developed to reconcile MRTU price information with each utility's overall procurement costs.

## **VII. Residential rate issues.**

*PG&E observes that TOU rates are already available, CPP rate options are in the process of being made available to all residential customers, and there are plans to request authorization soon for a Peak Time Rebate program. These programs can be successfully implemented for residential customers even while ABIX rate protections remain in place.*

PG&E agrees broadly with both TURN and DRA that demand response can be elicited from residential customers under current rate structures, primarily through TOU and CPP rate options (both of which can be supported by concurrent participation in A/C cycling and/or smart thermostat programs) and as augmented in the near future by a Peak Time Rebate program. However, both TURN and DRA have referred to concepts from a TOU/CPP rate proposal that DRA first presented in PG&E's AMI application (A.05-06-028), which would have required a method for attributing tiered usage amounts to specific TOU and CPP rate periods. (TURN at p. 8; DRA at p.24.) The full record from A.05-06-028 indicates that such an approach would likely be impracticable, given that the residential baseline quantities are ordinarily assigned to usage for an entire month and have never been established or used for specific TOU periods.

## **VIII. Critical Peak Pricing.**

*PG&E's current CPP rate program for large customers has proved successful, and PG&E is hopeful of achieving similar success with its new CPP rates for smaller customers.*

PG&E expects to continue offering its current CPP program for large customers for the foreseeable future. The CPP program for residential and smaller commercial customers will begin next summer, with broad availability in subsequent years as larger numbers of the new AMI meters are deployed.

**IX. Relationship to reliability-oriented and other demand response programs.**

*PG&E believes there are important roles to be played by both reliability-oriented programs and dynamic pricing options and tariffs. As a general rule, much more certainty can be attached to the load drop available from reliability-oriented programs, while dynamic pricing options should afford customers additional advance notice and more flexibility in day-to-day operations.*

There is general agreement that pricing programs will be most effective for the greatest number of customers if they are based on day-ahead price signals. As also noted in PG&E's opening comments, this means there will be an ongoing need for reliability-oriented demand response programs that are based on same-day load curtailment orders or same-day load control activation.

**X. Timing of tariff development and roll-out.**

*Many of PG&E's existing dynamic pricing options and tariff programs can be further refined or developed during PG&E's current GRC cycle. However, action on developing RTP tariffs should be deferred to PG&E's 2011 GRC.*

As PG&E previously stated, a variety of dynamic pricing tariff choices and demand response programs are already available, or are being made available across all customer classes.

Further action on developing RTP tariffs should be deferred to PG&E's 2011 GRC.

**XI. Customer Education.**

*The primary objectives for PG&E's customer education and marketing efforts are to actively help customers better understand their options, the changes taking place, and their potential for participation in dynamic pricing so that customers can make informed choices and implement those options to yield the overall best result for their individual circumstances.*

PG&E looks forward to continuing to provide its customers with important information about rate options and program choices, through a variety of program channels, which already include on-site audits for large customers, as requested by CMTA at page 15 of its comments.

PG&E does not believe that specific new findings on customer education or marketing are needed for purposes of this proceeding.



## **XII. Enabling Technology.**

*PG&E supports helping customers choose appropriate enabling technology for automated demand response participation, and will continue to monitor developments in the emerging market for such technologies.*

PG&E will continue to monitor the evolving market for demand response support technologies and will provide its customers with the best available information about such technology choices. PG&E does not believe that specific new investigation of or findings on enabling technology are needed for purposes of this proceeding.

## **CONCLUSION**

PG&E looks forward to continuing the dialogue on the above areas and the other issues from the Supplemental Scoping Memo and Assigned Commissioner Ruling at the November 5 and 6, 2007 workshop.

Respectfully Submitted,

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CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department, PO Box 7442, San Francisco, CA 94120.

On the 19th day of October, 2007, I served a true copy of:

**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON THE  
SUPPLEMENTAL SCOPING MEMO AND ASSIGNED COMMISSIONER  
RULING UPDATING ISSUES LIST, SCHEDULE, AND CATEGORIZATION**

By e-mail to all parties to A.06-03-005.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the 19th day of October, 2007.

/S/

\_\_\_\_\_  
LINDA S. DANNEWITZ

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Application of Pacific Gas and Electric Company To Revise Its Electric Marginal Costs, Revenue Allocation, and Rate Design.  (U 39 M)	Application 06-03-005 (Filed March 2, 2006)
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